

Exhibit G

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 2014CA011945 AG

SEARS, ROEBUCK AND CO., a New
York corporation,

Plaintiff,

v.

FORBES/COHEN FLORIDA
PROPERTIES, L.P., a Michigan limited
partnership,

Defendant.

**NOTICE OF FILING SEARS ROEBUCK AND CO.'S ANSWERS AND OBJECTIONS
TO DEFENDANT FORBES/COHEN FLORIDA PROPERTIES, L.P.'S FOURTH SET
OF INTERROGATORIES**

Pursuant to Rule 1.340 of the Florida Rules of Civil Procedure, Plaintiff Sears Roebuck and Co. ("Sears") hereby serves its responses to Defendant Forbes/Cohen Florida Properties, L.P.'s ("Forbes") Fourth Set of Interrogatories.

Respectfully submitted,

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-and-

SEARS HOLDING v. PALM BEACH GARDENS MALL-
2014CA011945 AG

NOTICE OF FILING SEARS ROEBUCK AND CO.'S ANSWERS
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PROPERTIES, L.P.'S FOURTH SET OF INTERROGATORIES

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email this 19th day of January 2016, to **E. Cole Fitzgerald, III, Esq., Steven A. Mayans, Esq., FITZGERALD MAYANS & COOKS, P.A.,** fitzgerald@fmc-lawfirm.com, jrodriguez@fmc-lawfirm.com, mayans@fmc-lawfirm.com, debenedetto@fmc-lawfirm.com, 515 N. Flagler Dr., West Palm Beach, FL 33401, and by electronic mail only to **Robert M. Carson, Esq., and Jeffrey B. Miller, Esq., Carson Fischer, P.L.C.,** 4111 Andover Road West Building, 2nd Floor, Bloomfield Hills, Michigan 48302 rcarson@carsonfischer.com, and jmiller@carsonfischer.com, and **Steven Merouse, Esq., and Natalie Spears, Esq.,** 233 South Wacker Drive, Suite 7800, Chicago, IL 60606 steven.merouse@dentons.com, natalie.spears@dentons.com, **R. Max Lohman, Esq., and Abigail F. Jorandby, Esq.,** 601 Heritage Drive, Suite 232, Jupiter, FL 33458, max@lohmanlawgroup.com, abby@lohmanlawgroup.com.

By: /s/ Steven L. Merouse

RESPONSE TO DEFINITIONS AND INSTRUCTIONS

Sears objects to Forbes' instructions to the extent they attempt to impose obligations beyond those imposed by the Florida Rules of Civil Procedure, and/or any applicable orders entered or to be entered in this matter.

SEARS, ROEBUCK AND CO.'S RESPONSES TO FORBES' INTERROGATORIES

1. Within the last ten years, identify each entity that with permission from Sears (whether as a licensee, space lessee, assignee, subleasee/subtenant, sub-subleasee/sub-subtenant, permittee, authorized user, or any other title) occupied or had employees on or within any portion of the Sears Premises who participated in sales activities (sales of goods or services).

RESPONSE: Sears objects to this Interrogatory No. 1 on the grounds that it is not relevant to any claim or defense in this Litigation and is not reasonably calculated to lead to the discovery of admissible evidence, and that it is overly broad.

Subject to and without waiving its objections to Interrogatory No. 1, the information sought in Interrogatory 1 for parties or entities occupying the Sears Premises within the last four years is listed in Exhibit A hereto.

2. For each entity identified in your answer to Interrogatory No. 1, separately describe in detail the circumstances and activities involved, including:

a. The dates of operation/activities;

SEARS HOLDING v. PALM BEACH GARDENS MALL-
2014CA011945 AG

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AND OBJECTIONS TO DEFENDANT FORBES/COHEN FLORIDA
PROPERTIES, L.P.'S FOURTH SET OF INTERROGATORIES

- b. Description of the portion and square footage of the Sears Premises involved in each operation/activity;
- c. For each involved person or entity, identify that person or entity by name if available and, if not, then by affiliation with entity involved;
- d. For each involved person or entity, describe in detail the relationship between Sears and the person or entity;
- e. Whether the operation required separate business tax receipts and/or separate licensing of any kind;
- f. Explanation of the relationship between each operator and Sears, including identification of any contractual relationship; and
- g. For each non-Sears employee identified in the foregoing subparagraphs, provide all contact information.

RESPONSE: Sears objects to this Interrogatory No. 2 on the grounds that it is not relevant to any claim or defense in this Litigation; that it is not reasonably calculated to lead to the discovery of admissible evidence; that it is vague and ambiguous as to "relationship" and as to the phrase "separate business tax receipts and/or separate licensing of any kind"; that it is overbroad as to time and in that it calls for various descriptions "in detail."

Subject to and without waiving its objections to Interrogatory No. 2, information regarding the entities, dates of operation, square footage, status as licensee or subtenant, contractual relationship with Sears, and whether the entity's sales are run through Sears'

accounting system or not, are listed in Exhibit A hereto. Sears requires its subtenants and licensees to acquire all necessary "licenses," but does not know itself whether such licenses are "required" or not.

SEARS HOLDING v. PALM BEACH GARDENS MALL-
2014CA011945 AG

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Dated: January 18, 2016

SEARS, ROEBUCK AND CO.

By: [Signature]

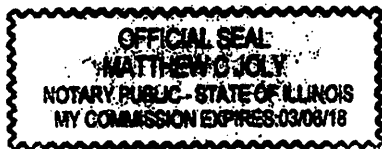
Its: [Signature]

STATE OF ILLINOIS

COUNT OF Cook

I HEREBY CERTIFY that this instrument was acknowledged before me on this 19th day of January, 2016 by Greg Simross who is personally known to me or who produced D. L. as identification, and who did take an oath, and states that he/she executed these answers to interrogatories and that they are true to the best of his/her knowledge and belief.

SWORN and SUBSCRIBED before me this 19th day of January, 2015



[Signature]
Notary Public
Commission expires:

Entity	Dates of Operation	Current Location / Square Footage	Status	Relationship	Receipts / Licensing
Luxottica Optical	1988 to present	1,337 square feet on level 2	Licensed Business	Contractual	Licensed businesses are responsible for any necessary licensing; sales run through Sears' point of sales system and reimbursed to licensed business.
CPI Portrait	1988 to April 2013	1,194 square feet on level 2	Licensed Business	Contractual	Licensed businesses are responsible for any necessary licensing; sales run through Sears' point of sales system and reimbursed to licensed business.
Miracle Ear Hearing	1988 through March 2015	676 square feet on level 2	Licensed Business	Contractual	No longer active.
GN Hearing Care Corp. (d/b/a Beltone Hearing)	June 2015 through present	676 square feet on level 2 (same space as occupied by Miracle Ear Hearing)	Licensed Business	Contractual	Licensed businesses are responsible for any necessary licensing; sales run through Sears' point of sales system and reimbursed to licensed business.
H&R Block / Tax	1988 through October 2012	999 square feet on level 1	Licensed Business	Contractual	No longer active
Jackson Hewitt / Tax	January 2013 through April 2015	999 square feet on level 1 (same space as occupied by H&R Block)	Licensed Business	Contractual	No longer active

Entity	Dates of Operation	Current Location / Square Footage	Status	Relationship	Receipts / Licensing
Karen Crouse / Watch Repair	1988 through present	338 square feet on level 2	Licensed Business	Contractual	Licensed businesses are responsible for any necessary licensing; sales run through Sears' point of sales system and reimbursed to licensed business.
Destination Maternity	April 2009 through present	315 square feet on level 2	Licensed Business	Contractual	Licensed businesses are responsible for any necessary licensing; sales run through Sears' point of sales system and reimbursed to licensed business.
iCan Health Benefits	October 2015 through present	999 square feet on level 1 (same space as occupied by H&R Block and Jackson Hewitt)	Licensed Business	Contractual	iCan Health Benefit is responsible for any necessary licensing; iCan Health Benefit's sales are not run through Sears' point of sales system.
Land's End	Spring 2008 through present*	6,188 square feet on level 2	Subtenant*	Contractual	Land's End is responsible for any necessary licensing; Land's End sales are run through Sears' point of sales system and reimbursed to Land's End.

*Land's End has occupied the Gardens since Spring 2008. From 2002 through April 2014, Land's End was a wholly owned subsidiary of Sears; Land's End became a subtenant in April 2014.